

Comments on Water Plan Highlights (March 1 draft), 3-11-05

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I like the format, readability, and general level of detail of the Highlights document.

I recognize that some improvements have been worked in since the conceptual discussion at the January Advisory Committee meeting, but further improvements still seem necessary:

1. The “building blocks” diagram is not yet accurate, clear, and satisfactory. It distinguishes between sustainability and reliability, though B-160 acknowledges that social, political, legal, and practical considerations are making such a distinction decreasingly useful. As presented, the Foundational Actions are not really “actions” so much as goals, and they’re not “foundational” in the sense that they come first and support the Initiatives- the text indicates that the Actions would be pursued only within the Initiatives, and therefore that the Initiatives are first and basic. The “plan” is to improve water quality, water use efficiency, and environmental stewardship through overall implementation of Initiatives 1 and 2, without requiring any individual components of these Initiatives to contribute, and with no responsible or accountable party identified.

As a remedy for these conceptual shortcomings, I suggest addition of a third Initiative, “Improve Statewide Management of Water Resources”, which would more directly and effectively undertake improvements in water quality, water use efficiency, and environmental stewardship. This addition would allow the present Initiative 2 to concentrate on the “Maintain and Improve Physical Facilities” tasks which are clearly its primary interest. The new set of three could be labeled “Initiatives for Reliability and Sustainability”, and below or around them the diagram could show goals, principles, and/or “essential support activities”.

If this important, appropriate, relatively simple suggestion for a third Initiative is not accepted, I recommend that the existing Initiative 2 be retitled “Improve Statewide Water Management” (striking the final word “Systems”), and that the text provide more discussion of the non-structural responsibilities of Initiative 2, and that the “Foundational Actions” be re-labeled as goals or objectives, and that title of the third “action” be changed to “Improve Environmental Stewardship” or “Restore and Protect the Environment”, since “Support Environmental Stewardship” implies that stewardship is primarily the responsibility of Somebody Else.

2. The first identified “Essential Support Activity” (p.13) is “Reform State government for effective leadership, assistance, and oversight.” Such a suggestion has been proposed at various meetings and workshops, but I don’t recall any B-160 language devoted to it, and I don’t know what it’s intended to mean here. If discussion is forthcoming in Volume 1, there may not be a problem; if I’ve overlooked the section in Vols. 2-4 that produced this highlight, I apologize. However, for effective communication it seems important to avoid presenting a highlight that can mean wildly different things to different readers (more regulation? less? elimination of some boards and commissions? additional powers for these bodies? etc), so I suggest that the proposed reform be discussed in detail somewhere in the Water Plan, or, if such discussion is not provided, that this “highlight” be deleted.

3. Most of the 14 highlighted Recommendations of this Update are summarized as Essential Support Activities, or else incorporated directly into the Initiatives; the two exceptions are #6, regarding state leadership, and #12, regarding Public Trust supervision. If these recommendations are as worthy as the others, they should not thus appear to be neglected or de-emphasized compared to the others..

4. A praiseworthy goal of the proposed Initiative 2 is “Sustain the Sacramento-San Joaquin Delta”. The associated text is limited exclusively to levee improvements, but surely it’s not the position of the State that the Delta can be sustained solely by sound levees, and that flow volume, water quality, pumping rates, and other considerations are of no importance. I recommend that a more complete discussion be provided about how this component of Initiative 2 will Sustain the Delta. Alternatively, the title could be scaled back to something like “Improve Delta Levees”, but if this approach is taken, some additional editorial work is needed to distinguish the retitled component from the preceding “Improve Flood Management”. With either title, explanation is needed about how and why this component differs from “Implement the CALFED Bay-Delta Program”, which already proposes to sustain the Delta and attend to its levees.

Thanks for the opportunity to review this draft document,

Arnold Whitridge